

Appn No. 09/692,746

Amdt date November 1, 2004

Reply to Office action of April 30, 2004

REMARKS/ARGUMENTS

Applicant thanks the Examiner for his consideration of the present application. Claims 1-15 and 19-51 are presently pending. Applicant has amended claims 1 and 29 as set forth herein. Applicant respectfully requests that the Examiner contact Applicant's undersigned counsel to conduct a telephonic interview with respect to the claimed subject matter and the cited art.

The Examiner has objected to the specification under 35 U.S.C. Section 132 for allegedly adding new matter to the specification, namely "nondedicated cryptographic device". Applicant respectfully requests that the objection be withdrawn. As the specification clearly discloses on pages 6 and 7, each remotely located cryptographic modules is "stateless, meaning that a PSD package can be passed to any device because the application does not rely upon any information about what occurred in the previous PSD package. Therefore, multiple cryptographic modules can also be added to each appropriate subsystem in order to handle increased loads." Applicant used the word "nondedicated" to refer to the stateless nature of the device, but has now amended claims 1 and 29 to refer to "stateless cryptographic device" as opposed to "nondedicated cryptographic device." Accordingly, as the limitation is clearly disclosed in the specification as filed, Applicant respectfully requests that the Examiner withdraw the new matter objection.

The Examiner has rejected claims 1-15 and 19-51 under 35 U.S.C. Section 103(a) as being unpatentable over Allport et.

Appln No. 09/692,746

Amdt date November 1, 2004

Reply to Office action of April 30, 2004

al., U.S. Patent Application Publication 2001/0037320 ("Allport") in view of Heiden, U.S. Patent 6,408,286 ("Heiden"). Applicant respectfully requests that the rejection be withdrawn. The Examiner admits that Allport "fails to teach a digitally signed advertising graphics to be printed next to the VBI," instead citing Heiden. See Office Action, paragraph 8 [emphasis added]. As set forth in amended claims 1 and 29, in one embodiment of Applicants invention, a scalable system is disclosed that includes a plurality of stateless cryptographic devices in which any one or more of the devices may be used to authenticate the digital signature applied to an advertisement on an envelope.

Further, none of the references, either alone or in combination discloses a system that includes "a plurality of stateless cryptographic devices remote from the plurality of user terminals and coupled to the computer network, wherein the cryptographic devices include a computer executable code for verifying that the advertisement graphics is authorized to be printed next to the VBI, and wherein any one or more of the plurality of cryptographic devices may be used for verifying the advertising graphics." Applicant has further amended the claim to recite that at least a plurality of the cryptomodules are stateless and that "any one or more of the plurality of cryptographic devices may be used for verifying the advertising graphics for any one or more of the plurality of user terminals." Independent claim 29, recites "verifying the digitally signed advertisement graphics using any of a plurality of stateless cryptographic modules, wherein any of the plurality

Appln No. 09/692,746

Amdt date November 1, 2004

Reply to Office action of April 30, 2004

of cryptographic modules may be used for verifying the digitally signed advertisement graphics for any one or more of the users "
Neither of the claimed limitations are disclosed or suggested in the relied upon references.

Allport focuses on a traditional "closed system postage meter," and more particularly on a method and system for enhancing the capabilities of traditional postage meter to enable it to print advertisements as well as postage. See, e.g., Allport [0019 - 0011] and FIG. 1, mailing machine 105 with localized/enclosed meter 150, keyboard 162, display 164, printer 158, scanner 120 and mailing piece transport 140. As such, Allport does not appear to disclose remotely located user terminals and cryptomodules in the context of providing advertising graphics adjacent a VBI, nor does it disclose stateless cryptomodules. Accordingly, Applicant respectfully requests that the rejection be withdrawn and the claims allowed.

Based on the foregoing, Applicant respectfully submits that the pending claims are in condition for allowance, and respectfully requests early issuance of a Notice of Allowance.

Respectfully submitted,

CHRISTIE, PARKER & HALE, LLP

By



Art Hasan

Reg. No. 41,057

626/795-9900

SAH/amb

SAH PAS565533.1--11/1/04 5:31 PM